

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LAKISHA LEE, DESTINI LEE, a minor,)	
By and through Next Friend and mother)	
Lakisha Lee, and CLARA WILLIAMS,)	Cause No. 4:13-cv-01882
)	
Plaintiffs,)	
)	
vs.)	
)	
THE HUBACH GROUP, INC. and)	
ROBERT ACHTZIGER,)	
)	
Defendants.)	

MOTION TO ADJUDICATE LIENS OF PLAINTIFF
LAKISHA LEE

COMES NOW, E. Ryan Bradley of The Bradley Law Firm, L.L.C. and for the Motion to Adjudicate Plaintiffs' Liens states to the Court as follows:

1. That Plaintiff, LaKisha Lee has settled this matter in the amount of \$55,000.00.
2. Plaintiff's executed a Contingency Fee Agreement wherein Plaintiff agreed to pay attorneys' fees of forty percent of any amount recovered if suit is filed.
3. That as a courtesy to Plaintiff, the undersigned reduced his fee to thirty-five percent.
4. That after attorney's fee of thirty-five percent, \$19,250.00, and expenses in the amount of \$791.70 there remains \$34,958.26.
5. That under the Missouri Lien Statute, RSMo. 430.225, fifty percent of this net, \$17,479.13 is to be paid to the Plaintiff and the remaining fifty percent is divided, pro-rata between all provider liens.
6. That in accordance with this Missouri Statute, distribution to medical providers is as follows:

LIENHOLDER	Full Lien Amount	% of 19,583.82	Amount owed % x \$17,479.13
MFG Spine	1144.00	5.84	\$1020.78
St. Louis Orthopedic Surgery Center	5356.00	27.35	\$4780.54
Pain and Rehab Specialists	2266.00	11.57	\$2022.33
MRI Partners of Chesterfield	4450.00	22.72	\$3971.41
Center for Interventional Pain Mgmt	6367.82	32.52	\$5684.21

7. That in addition to medical liens, Plaintiff obtained a pre-funding settlement loan on

May 3, 2012 and the payoff, good through May 1, 2014 is \$3,450.00.
8. That Plaintiff instructed the undersigned not to pay her medical providers that do not

have liens.
9. That Plaintiff was made aware this is against attorney's advice and that she will

be fully responsible for payment of all medical bills.
10. The following providers did not file a lien under RSMo 430.225.
 - a. Barnes-Jewish Hospital
 - b. City of St. Louis EMS
 - c. Washington University Physicians
11. The undersigned requests this Court adjudicate the liens and disburse Plaintiff

LaKisha Lee's settlement as follows:

Total Settlement	\$55,000.00
<Attorneys' Fees of 35%	- \$19,250.00
<Costs and Expenses>	- \$ 791.70
<MFG Spine>	- \$ 1020.78

<St. Louis Orthopedic Surgery Center>	- \$ 4780.54
<Pain and Rehab Specialists>	- \$ 2022.33
<MRI Partners of Chesterfield>	- \$ 3971.41
<Center for Interventional Pain Management>	- \$ 5684.21
Promissory Note to Professional Funding	- \$3450.00
NET DUE TO PLAINTIFF	\$14,029.03

WHEREFORE, Plaintiff requests this Court issue an Order instructing payment of the medical liens set forth above in accordance with Missouri law and for any such other and further relief as this Court deems appropriate under the circumstances.

Respectfully submitted,

/s/ E. Ryan Bradley

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CERTIFICATE OF MAILING

I hereby certify that a copy of the foregoing was served upon all counsel of record via the Court's electronic filing system. /s/ ERB